

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF SOUTH CAROLINA**

In re :

American Log Handlers, LLC,

Alleged Debtor.

Case No. 14-05141-dd

Chapter 7

**PETITIONING CREDITORS' RESPONSE TO THE
CAMPBELL LAW FIRM, P.A.'S MOTION TO
WITHDRAW AS COUNSEL**

Petitioning creditors International Forest Products LLC ("IFP"), Enterprise Forest Products, Inc. ("Enterprise"), and Midwest Forest Products Company ("Midwest") (collectively, the "Petitioning Creditors"), by and through their undersigned counsel, hereby submit their response to The Campbell Law Firm, P.A.'s Motion to Withdraw as Counsel ("Motion") filed on February 19, 2015. In support of their Motion, Petitioning Creditors incorporate by reference their Motion for Sanctions, Requests for Attorneys' Fees and Costs, and Motion for Status Conference and to Toll Deadlines in Scheduling Order, filed on February 13, 2015 (the "Sanctions Motion").

As set forth in the Sanctions Motion, despite filing an Answer in this proceeding which sets forth numerous allegations against Petitioning Creditors, American Log Handlers, LLC ("American Log") has failed to cooperate in any respect in this involuntary proceeding. American Log failed to respond to Petitioning Creditors' numerous attempts to obtain responses to their discovery requests, necessitating the filing of a Motion to Compel Discovery, which was granted by the Court's entry of an Order on January 22, 2015. American Log then ignored that Order, requiring Petitioning Creditors to file their Sanctions Motion. American Log's unwillingness to participate in this involuntary proceeding, despite the filing of its Answer, is

further bolstered by the statements made in the Motion, that American Log has failed to cooperate and communicate with its counsel.

Through its conduct throughout this proceeding, American Log has delayed the proceeding without justification. American Log should not be permitted to file an Answer contesting the involuntary petition and setting forth allegations of, among others, bad faith by Petitioning Creditors, and then refuse to participate any further in the proceeding.

Accordingly, Petitioning Creditors do not object to The Campbell Law Firm, P.A.'s Motion, but respectfully reiterate their request made in their Sanctions Motion, for the Answer of American Log to be stricken and an Order for Relief entered in this involuntary proceeding, due to American Log's conduct throughout the involuntary proceeding and, if the Motion is granted, American Log's inability to represent itself in this proceeding.

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March 5, 2015

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CERTIFICATE OF SERVICE

I, the undersigned, do hereby certify that on March 5, 2015, I served the below-named parties with copies of the following document(s):

Petitioning Creditors' Response to the Campbell Law Firm, P.A.'s Motion to Withdraw as Counsel.

by mailing said copies to them by first-class, United States mail, postage prepaid, with return address clearly shown to said parties at the addresses shown below.

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March 5, 2015